

# **EXHIBIT A**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al., <sup>1</sup>	)	Case No. 01-01139 (KJC)
	)	(Jointly Administered)
Reorganized Debtors.	)	
	)	Re: Docket Nos. 31812, 31856, 31873, 32044, 32068,
	)	32233, 32324, 32503, 32560, 32570 and 32571

**ORDER APPROVING AMENDED STIPULATION FOR BRIEFING SCHEDULE AND  
HEARING DATE FOR ANDERSON MEMORIAL HOSPITAL'S MOTION TO ALTER  
OR AMEND ORDER DENYING MOTION FOR CLASS CERTIFICATION**

Upon consideration of the Amended Stipulation for Briefing Schedule and  
Hearing Date for Anderson Memorial Hospital's ("AMH") Motion to Alter or Amend Order  
Denying Motion for Class Certification attached hereto as Exhibit 1 (the "Stipulation") and after  
due deliberation and sufficient cause appearing therefore;

IT IS HEREBY ORDERED THAT:

1. The Stipulation and all of its terms are approved.
2. As set forth in the Stipulation:
  - (a) AMH shall submit its opening brief on the issue of class certification within ninety (90) days of June 8, 2015;
  - (b) Reorganized Debtors shall submit their responsive brief within ninety (90) days of filing of AMH's opening brief, and Reorganized Debtors' responsive brief shall be no longer in number of words than AMH's opening brief;

---

<sup>1</sup> The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.) and W. R. Grace & Co.-Conn. At the time of filing of AMH's Motion, there were 62 debtors. On March 19, 2014, Grace filed and the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Merged Subsidiaries. [Docket No. 31880] On September 16, 2014, Grace filed a motion closing the Chapter 11 cases of certain additional Grace subsidiaries, and on October 14, 2014, the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Grace subsidiaries. [Docket No. 32429] Accordingly, Grace and Grace-Conn. are the surviving Reorganized Debtors.

- (c) AMH shall submit its reply within thirty seven (37) days of filing of Reorganized Debtors' responsive brief, and AMH's reply shall be no longer in number of words than half the number of words of Reorganized Debtors' responsive brief;
- (d) To the extent necessary, the page limits in Local Rule 7007-2 may be exceeded; and
- (e) A hearing will be held on AMH's request for class certification on the first omnibus hearing date that is at least fifteen (15) business days after the completion of briefing or on such other date as may be agreed upon by the parties and the Court or ordered by the Court.

The Court shall retain jurisdiction to hear and determine all matters arising from or in connection with the implementation, enforcement and interpretation of this Order.

Dated: August \_\_, 2015

---

The Honorable Kevin J. Carey,  
United States Bankruptcy Court Judge

**EXHIBIT 1**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., et al., <sup>1</sup>	)	Case No. 01-01139 (KJC)
	)	(Jointly Administered)
Reorganized Debtors.	)	
	)	Re: Docket Nos. 31812, 31856, 31873, 32044, 32068, 32233, 32324, 32503, 32560, 32570 and 32571

**AMENDED STIPULATION FOR BRIEFING SCHEDULE AND HEARING DATE FOR  
ANDERSON MEMORIAL HOSPITAL'S MOTION TO ALTER OR AMEND ORDER  
DENYING MOTION FOR CLASS CERTIFICATION**

On March 5, 2014, Anderson Memorial Hospital ("AMH") filed its *Motion to Alter or Amend Order Denying Motion for Class Certification and for Entry of Scheduling Order and Granting Related Relief* (the "Motion"). The Court having considered the Motion, the Objection filed by the Reorganized Debtors and the Reply filed by AMH, and having held a hearing on April 15, 2015;

And the Court having entered the Order Approving Stipulation for Briefing Schedule and Hearing Date For Anderson Memorial Hospital's Motion to Alter or Amend Order Denying Motion for Class Certification 6/8/15 Dkt. 32571;

---

<sup>1</sup> The Reorganized Debtors are W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.) and W. R. Grace & Co.-Conn. At the time of filing of AMH's Motion, there were 62 debtors. On March 19, 2014, Grace filed and the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Merged Subsidiaries. [Docket No. 31880] On September 16, 2014, Grace filed a motion closing the Chapter 11 cases of certain additional Grace subsidiaries, and on October 14, 2014, the Court entered a Final Decree which, *inter alia*, closed the Chapter 11 cases of certain Grace subsidiaries. [Docket No. 32429] Accordingly, Grace and Grace-Conn. are the surviving Reorganized Debtors.

Therefore, with respect to the Motion, IT IS HEREBY STIPULATED AND AGREED, by, between, and among the undersigned, the attorneys of record for Reorganized Debtors W. R. Grace & Co., et al. ("Grace") and AMH, subject to the approval of the Court, that:

- 1) AMH shall submit its opening brief on the issue of class certification within ninety (90) days of June 8, 2015;
- 2) Reorganized Debtors shall submit their responsive brief within ninety (90) days of filing of AMH's opening brief, and Reorganized Debtors' responsive brief shall be no longer in number of words than AMH's opening brief;
- 3) AMH shall submit its reply within thirty seven (37) days of filing of Reorganized Debtors' responsive brief, and AMH's reply shall be no longer in number of words than half the number of words of Reorganized Debtors' responsive brief;
- 4) To the extent necessary, the page limits in Local Rule 7007-2 may be exceeded; and
- 5) A hearing will be held on AMH's request for class certification on the first omnibus hearing date that is at least fifteen (15) business days after the completion of briefing or on such other date as may be agreed upon by the parties and the Court or ordered by the Court.

Dated: August 24, 2015

FERRY JOSEPH , P.A.

/s/ Theodore J. Tacconelli

Theodore J. Tacconelli (No. 2678)

Ferry Joseph , P.A.

824 Market Street, Suite 1000

P.O. Box 1351

Wilmington, DE 19899

Telephone: (302) 575-1555

Facsimile: (302) 575-1714

And

Daniel A. Speights (SC Fed. ID No. 4252)  
A. Gibson Solomons (SC Fed. ID No. 7769)  
SPEIGHTS & RUNYAN  
100 Oak Street East  
P.O. Box 685  
Hampton, SC 29924  
Telephone: (803) 943-4444  
Facsimile: (803) 943-4599

And

John W. Kozyak (FL Bar No. 200395)  
David L. Rosendorf (FL Bar No. 996823)  
KOZYAK TROPIN & THROCKMORTON  
2525 Ponce de Leon, 9th Floor  
Coral Gables, FL 33134  
Telephone: (305) 372-1800  
Facsimile: (305) 372-3508

*Counsel for Anderson Memorial Hospital*

PACHULSKI STANG ZIEHL & JONES LLP

/s/ James E. O'Neill

Laura Davis Jones (Bar No. 2436)  
James E. O'Neill (Bar No. 4042)  
919 N. Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, DE 19899-8705  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400

And

KIRKLAND & ELLIS LLP

John Donley, P.C.

Lisa Esayian

300 North LaSalle

Chicago, IL 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

*Attorneys for Reorganized Debtors*